



Pacific Coast
Wild Salmon
Society



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For Immediate Release:

Government Science Mired in Salmon Farming Industry Secrecy Conservation Groups Question Integrity of Federal Science Review Process

Vancouver, B.C.—A recently published federal science report assessing the risk of a virus spreading from ocean salmon farms to wild Pacific salmon is partially based on a secret Memorandum of Understanding (MoU) between several salmon farming companies.

The secret MoU that allegedly substantiates the report's conclusions was not accessible for examination by some members of the federal science review process, including Stan Proboszcz, Science Advisor, Watershed Watch Salmon Society. Mr. Proboszcz was a steering committee member for the process that produced the report and was declined access to the MoU by a Fisheries and Oceans Canada (DFO) report author. Due to this lack of transparency, Mr. Proboszcz and several prominent conservation groups are calling the report's conclusions into question.

The inability to examine the details of the MoU is contradictory to the fundamental principles of peer-reviewed science. This lack of transparency raises questions about DFO's relationship with the salmon farming industry and a potential conflict of interest between promoting the industry and protecting wild salmon stocks from industry diseases.

"It appears our federal government is more interested in protecting salmon farming industry secrets than maintaining scientific integrity and taking precautionary action to protect wild fish," said Mr. Proboszcz, Watershed Watch Salmon Society.

Watershed Watch Salmon Society, Living Oceans Society and the Pacific Coast Wild Salmon Society are calling on the federal government to revamp the flawed DFO science review process (known as CSAS). The Conservation groups are urging the federal government to enforce DFO's Values and Ethics Code which states public service workers should prevent and avoid, "situations that could give the appearance of a conflict of interest, result in a potential for a conflict of interest or result in an actual conflict of interest."

CSAS Science Advisory Report for Infectious Hematopoietic Necrosis Virus: http://www.dfo-mpo.gc.ca/csas-sccs/Publications/SAR-AS/2017/2017_048-eng.html

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Backgrounder

Canadian Science Advisory Secretariat (CSAS)

CSAS is headquartered within Fisheries and Oceans Canada (DFO) and it coordinates science review processes throughout the country. The goal of DFO's CSAS process is to provide high quality scientific advice to the Minister of Fisheries and Oceans, managers, and other interested parties through rigorous peer-review. This scientific advice is supposed to inform policy and management options and decisions. The CSAS process responds to specific questions on various subjects such as the state of fish stocks, species at risk and other fisheries issues.

A guiding principle in scientific peer-review is transparency. Transparency is also a commitment made by this federal government. DFO has indicated its intention to conduct more peer reviews of other salmon farm viruses in addition to Infectious Hematopoietic Necrosis Virus (IHNV); hence, flaws in the process should be addressed now.

What are the major concerns with the IHNV CSAS?

- Report conclusions were substantiated in part by a confidential Memorandum of Understanding (MoU) between salmon farming companies that was unavailable for scrutiny through the peer-review process. Although some parts of the MoU were allegedly summarized in a CSAS report on Salmon Farming Health Management Practices, it was impossible to examine the veracity of these summarized claims without access to the MoU. This has significant implications on the report conclusions and the level of certainty of the likelihood of disease outbreaks on salmon farms.
- The CSAS peer-review process had no explicit conflict of interest criteria when considering its steering committee and participants, therefore it may be imbalanced with an over representation of pro-industry perspectives and biases. An imbalance in pro-industry representation could significantly affect the conclusions of the risk assessment report due to its qualitative nature (as opposed to if a more rigorous quantitative risk assessment was used).

Were DFO's CSAS guidelines and principles violated?

DFO's CSAS science reviews are professedly based on the Government of Canada's Scientific Advice for Government Effectiveness (SAGE) principles and DFO's Values and Ethics Code.

The SAGE principles and the Values and Ethics Code are found here:

SAGE - <http://publications.gc.ca/collections/Collection/C2-445-1999E.pdf>

Values and Ethics Code - <http://www.dfo-mpo.gc.ca/reports-rapports/vicr-virc/vicr-virc2012-eng.htm>

SAGE principles that may have been violated by DFO are:

- Ensure Inclusiveness (expertise and perspectives)
- Sound Science & Science Advice (rigorous, professional)
- Uncertainty and Risk (assess & communicate)
- Transparency and Openness (public science documents)

Components of DFO's Values and Ethics Code that may have been violated include:

- "Taking all possible steps to recognize, prevent, report, and resolve any real, apparent or potential conflicts of interest between our official responsibilities and any of our private affairs"
- "Public servants shall serve the public interest by: 1. Acting at all times with integrity, and in a manner that will bear the closest public scrutiny,"
- "Showing favouritism, bias or preferential treatment;"

The connection between CSAS, salmon farm diseases and the \$37 million Cohen Inquiry

The \$37 million federal Cohen Inquiry recently investigated the decline in B.C.'s Fraser River sockeye salmon and made 75 recommendations. The inquiry identified salmon farms as a risk to wild fish and made several recommendations regarding the industry.

Justice Bruce Cohen wrote, "As long as DFO has a mandate to promote salmon farming, there is a risk that DFO will act in a manner that favors the interest of the salmon-farming industry over the health of wild fish stocks."

Recommendation #3 suggested the federal government remove the promotion of salmon farming from DFO's mandate due to a possible conflict of interest. Despite the government's commitment to implement the Inquiry recommendations (as per the Prime Minister's mandate letter to the Minister of Fisheries and Oceans), DFO's recent actions suggest they have not addressed this conflict of interest and it may be compromising federal science, putting wild salmon at risk from salmon farms.

Reversal of the burden of proof being placed back on the federal government

Two particularly relevant recommendations (#'s 18 and 19) state that salmon farms in the Discovery Islands area (in Georgia Strait near Campbell River) should be removed unless the Minister of Fisheries is satisfied they pose no more than a minimal risk to wild salmon. If the Minister allows the farms to stay, he must publish the substantiation used to make his decision on the DFO website.

These recommendations are relevant because they reverse the burden of proof and put it squarely on government to show that salmon farms are not more than a minimal risk of serious harm to wild salmon.

Why is the federal government conducting this science review on salmon farm viruses?

Recommendations 18 and 19 spurred the need for a new series of science review processes to examine the risk of various salmon farm viruses on wild salmon. Infectious Hematopoietic Necrosis Virus (IHNV) is the first virus to be examined by the CSAS peer-review process and is the subject of this DFO science review.

This federal government explicitly committed to implement the recommendations of the Cohen Commission in the mandate letter from the Prime Minister to the Minister of Fisheries and Oceans.

This questionable IHNV CSAS peer review process raises questions about DFO's ability to conduct objective scientific peer reviews in the face of potential conflicts of interest linked to the promotion of the salmon farming industry.